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February 23, 2018

Ex Parte

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Deployment, WT Docket No. 17-79; Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Deployment, WT Docket No. 17-84

Dear Ms. Dortch:

Verizon fully supports the Commission's efforts to speed wireless broadband deployment and pave the way for enhanced 4G and 5G networks by removing impediments to wireless facility siting, particularly small cells. As we explained in our comments in these proceedings, historic preservation and environmental requirements adopted more than a decade ago for macro deployments impose unnecessary costs and delays on small cell deployments.¹

To demonstrate the need to reform these processes, Verizon offers the following cost data. We examined small cell deployments in 2017 in five urban markets across the United States, using sample sizes of 5-19 sites, depending on the availability of data. All of the deployments were collocations on existing structures, which we estimate account for approximately 80 percent of our small cell deployments. We found that completing NEPA and NHPA (including tribal) reviews comprised, on average, 26 percent of the total small cell deployment costs (including equipment costs). In the five markets we studied, the NEPA and NHPA share of total costs ranged from 19 percent to 37 percent.

Actions by the Commission to reduce these costs are urgently needed, as providers including Verizon undertake to deploy hundreds of thousands of small cells to densify their 4G networks and to build new 5G networks.

¹ *Accelerating Wireless Broadband Deployment by Removing Barriers to Infrastructure Deployment, WT Docket No. 17-79; Accelerating Wireline Broadband Deployment by Removing Barriers to Infrastructure Deployment, WT Docket No. 17-84, Comments of Verizon (filed June 15, 2017), at 44-64.*

Marlene H. Dortch

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This letter is being filed pursuant to Section 1.1206 of the Commission's Rules. Should you have any questions, please contact the undersigned.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jonathan L. Klein".